IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

BISOUS BISOUS LLC,

Plaintiff.

v.

Case No. 3:21-CV-01614-B

THE CLE GROUP, LLC, BISOU UPTOWN MANAGER, LLC, and BISOU LP HOLDINGS, LLC,

Defendants.

JOINT MOTION TO STAY

Plaintiff Bisous Bisous, LLC and Defendants have reached a settlement in principle that will dispose of all claims and defenses asserted by all parties in this action. The parties need time to finalize a settlement agreement, and expect to file a joint motion to dismiss with prejudice all claims and counterclaims within the next 30 days. Accordingly, the parties respectfully request a 30-day stay of this case.

This motion is not submitted for delay, but to accommodate and facilitate final settlement between the parties.

Date: December 13, 2021 Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service and are being served with a copy of this document via the Court's CM/ECF systems on this 13th day of December, 2021.

/s/ Kenneth P. Kula
Kenneth P. Kula